



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

Carol A. Laham
Wiley Rein LLP
1776 K Street, N.W.
Washington, D.C. 20006

JUN 21 2007

RE: MUR 5750
Citizens Club for Growth, Inc. PAC

Dear Ms. Laham:

On June 14, 2006, the Federal Election Commission notified your clients, Citizens Club for Growth, Inc. PAC and Pat Toomey, in his official capacity as Treasurer ("CCFG"), of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended.

On May 30, 2007, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe CCFG violated the Act. Accordingly, the Commission closed its file in this matter as it pertains to CCFG. The Factual and Legal Analysis, which more fully explains the Commission's finding, is enclosed.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Julie McConnell, Acting Assistant General Counsel, at (202) 694-1650.

Sincerely,

Thomasenia P. Duncan
General Counsel

BY: Ann Marie Terzaken.
Acting Associate General Counsel for
Enforcement

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Citizens Club for Growth and Pat Toomey,
in his official capacity as Treasurer

MUR: 5750

This matter was generated by a complaint filed with the Federal Election Commission by Chafee for Senate. *See* 2 U.S.C. § 437g(a)(1). The complainant alleges that Laffey US Senate failed to identify Citizens Club for Growth (“CCFG”) in its disclosure reports as the source of \$366,378 in earmarked contributions. Because CCFG’s disclosure reports appear to properly disclose the earmarked contributions it made to Laffey US Senate, there is no reason to believe that Citizens Club For Growth, and Pat Toomey, in his official capacity as Treasurer, violated the Act.

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